

Commissioners:

My comments with respect to Amateur Station Frequency Privileges, High Frequency Privileges proposed changes are based on the following: (1) I am primarily a CW and narrowband Data operator, (2) the ITU Regions 1, 2 (non-US) and 3 privileges and band plans, (3) the mode trend of HF operating amateurs and (4) amateur radio contesting.

A. 75/80M. I would suggest that the ARRL's band re-farming be expanded further. I would propose the following: 3500-3650 kHz for CW, RTTY and narrowband Data transmissions. 3650-4000 kHz for phone, SSTV, other wide band modes and the continued allowance of CW operations. Further broken down to the following: 3500-4000 kHz Extra Class licensees, 3525-3650 kHz and 3675-4000 kHz for Advanced Class licensees, 3525-3650 kHz and 3725-4000kHz for General Class licensees. Novice Class licensees and Technician Class Licensees who have received credit for passing a Morse code examination would be granted CW, RTTY and narrowband Data privileges within 3525-3650 kHz.

The current 80M band is under utilized by CW, RTTY and narrowband Data modes. The most popular mode for 75M is phone. Expansion of the phone portion of the 75/80M bands would permit more band space for phone operations, while still allowing sufficient band for CW, RTTY and narrowband Data transmissions. Additionally, this would allow phone operations between the ITU regions, as non-US amateurs have phone privileges in the current 80M portion of the band. Lastly, contesting is a way of life in the amateur radio community. Re-farming the privileges as suggested may well reduce the necessity of split frequency operations and entire band involvement during worldwide and other phone contests.

B. 40M. I support the ARRL proposal for expanding the phone portion of 40M, to 7125 - 7300 kHz. Additionally, I would propose that Novice Class licensees and Technician Class Licensees who have received credit for passing a Morse code examination be granted CW, RTTY and narrowband Data privileges in the 7025-7125 kHz portion of the band.

C. 15M. I would fully support the granting of CW, RTTY and narrowband Data privileges to Novice Class licensees and Technician Class Licensees who have received credit for passing a Morse code examination in the 21025-21200 kHz portion of the band.

D. 10M. I also support the ARRL proposal to grant Novice Class licensees and Technician Class Licensees who has received credit for passing a Morse code examination CW, RTTY and narrowband data privileges in the 28100-28300 kHz portion of the band.

The amateur radio hobby is changing and evolving. Increased demands are pressing 75M. New narrowband data techniques are presenting themselves and becoming quickly popular. Integration of computers with amateur equipment is burgeoning. Re-farming or adjusting the band operating privileges to accommodate a fair and equitable need is due. I would ask the commission to consider the proposals I have presented. I feel they will enhance the better utilization of the 75/80M band. Additionally, granting additional privileges to Novice Class licensees and Technician Class Licensees who has received credit for passing a Morse code examination will encourage them to expand their amateur radio techniques and enjoyment of the hobby.

Respectfully submitted,

Karl W. Zuege, KB1DSB  
2176 Drake Road  
Bomoseen, VT 05732